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5	Attorneys for Defendant and Cross-Complainant GERALD ARMSTRONG	
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8	SUPERIOR COURT OF THE STATE OF CALIFORNIA	
9	FOR THE COUNTY OF LOS ANGELES	
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11	CHURCH OF SCIENTOLOGY OF) CASE NO. C 420 153	
12	CALIFORNIA,)) SUPPLEMENTAL RESPONSE OF	
13	Plaintiff,) DEFENDANT AND CROSS-COMPLAINANT) GERALD ARMSTRONG TO	
14	vs.) INTERROGATORIES PROPOUNDED BY) PLAINTIFF AND CROSS-DEFENDANT	
15) CHURCH OF SCIENTOLOGY OF GERALD ARMSTRONG, et al.,) CALIFORNIA	
16	Defendants.) (SET NUMBER ONE)	
17)	
18	AND RELATED CROSS-ACTION)	
19)	
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21	Defendant and Cross-Complainant, Gerald Armstrong,	
22	pursuant to Section 2030 of the California Code of Civil Procedure	2
23	hereby submits a supplemental response to Interrogatory Number 5	
24	of the first set of Interrogatories propounded by Plaintiff and	
25	Cross-Defendant Church of Scientology of California.	
26	Supplemental Response to Interrogatory No. 5:	
27	A. In February 1982, Plaintiff and Cross-Defendant,	
28	hereinafter referred to as "the organization," commenced an	

1 intelligance operation to surveil, penetrate, compromise, frame 2 and destroy me. The organization assembled intelligence 3 information about me, including private and confidential 4 information taken from my auditing session files, and utilized 5 a very close friend Dan Sherman to effect these goals over the 6 next four years.

B. In March 1984, my former wife, Terri Gamboa, acting as an organization agent, carried out an intelligence operation target against me to ascertain personal information and "buttons" which could subsequently be used to lure me into a trap, frame me and destroy. Ms. Gamboa intruded upon my privacy and lied to me about the purpose of her operation and her function pursuant to the organization's "Fair Game Policy."

C. In June 1984 at Heathrow Airport in London, England, agents of the organization lied to, harassed and threatened my wife Jocelyn and me, also in accordance with "Fair Game."

17 D. Beginning in June, 1984, the organization carried out 18 a covert operation against me with the goals of invasion of my 19 privacy, embarrassment, entrapment, framing me with a fake crime, 20destruction of my reputation, destruction of my capacity to trust, 21 destruction of my friendships, and destruction of my marriage. 22The organization penetrated me by representing some of its 23 members as persons desiring to reform the organization and have it discontinue its tortious and criminal activities against 24 25individuals such as myself. These persons included at least 26Dan Sherman, Michael Rinder and someone known to me only as Joey. 27 These persons did not want to reform the organization and did not want to curtail its tortious and criminal activities, but were 28

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active participants in such activities; i.e., Fair Game.

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2 E. Without my permission or knowledge, organization 3 agents, specifically and at least Joey, Rinder, a private 4 investigator Eugene M. Ingram, and a Los Angeles Police Officer 5 working for Ingram, secretly videotaped me on at least four 6 occasions at meetings arranged by said agents. The four incidents 7 occurred in November 1984, and I became aware of them in April, 8 1985. These agents and the organization set me up to make me 9 think I was in a private conversation in a private setting, then 10 invaded that privacy.

F. To further the organization's invasion of my privacy it created at least three false Los Angeles Police Department authorizations "directing" the eavesdropping upon and recording of my private communications, including telephone conversations.

G. Beginning in April 1985, and continuing through the present, the organization, without my consent or knowledge, and for its own purposes and benefit, has reproduced and disseminated the illegally made videotapes of me in what I believed were private conversations with Joey and Rinder. The organization has shown edited versions of these videotapes to the press, public and law enforcement.

H. The organization has used the videotapes of me in a promotional scheme aimed at Scientologists from which it has made an estimated several million dollars.

I. The organization has published excerpts taken from the videotapes in several articles in its tabloid ""Freedom"" which has a circulation of millions. The organization handed out these tabloids in Court Houses, office buildings, on the street

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and in other public places across the country. The ""Freedom"" articles make numerous false statements about me, and accuse me falsely of criminal activity. At the time the articles were published the organization knew the allegations were untrue. It was done maliciously and with reckless disregard for the truth in order to destroy my reputation, my emotional and physical well-being, and my life.

8 J. Attorneys for the organization, specifically John G. 9 Peterson, Donald Randolph and Earle C. Cooley, have made numerous 10 sworn statements concerning the videotapes, their content and significance in courts around the country which are malicious and 11 perjurious. In fact, organization attorneys were instrumental in 1213 the whole videotape operation. They actively sought to frame me, 14 embarrass me, invade my privacy, deny me a right to a fair trial in my own case, destroy my ability to testify in any Scientology 15litigation, destroy my emotional and physical well-being and my 1617 life. They have put a twisted picture of the evidence contained 18 in the illegally obtained videotapes before Courts across the country, also in reckless disregard for the truth. 19

K. Based on the illegally obtained videotapes and a perversion of their content, the organization has filed false criminal charges with the District Attorney in Los Angeles. This is not only an attempt to cover the organization's own criminal acts by misdirecting the DA toward the victim of the crimes, but another effort to destroy my reputation, my well-being and my life.

L. The organization, through its agents in Boston, Massachusetts, filed a false criminal complaint against me with the Federal Bureau of Investigation.

1	N. Agents of the organization, without my permission
2	or knowledge, copied approximately 250 pages of my writings and
3	art work. These were all original creations and my personal
4	property. The organization invaded my privacy and obtained
5	possession of the copies by ruse. The organization continues to
6	violate my rights by retaining possession of these wrongfully
7	obtained materials.
8	O. Upon information and belief, agents of the
9	organization burglarized the trunk of my car and stole a briefcase
10	containing a manuscript of a book I was writing including several
11	pages of original art work. This manuscript is valued at
12	\$50,000.00.
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1	VERIFICATION
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3	State of Massachusetts
4	County of Suffolk
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6	I am a party to this action. I have read the foregoing
7	Supplemental Response of Defendant and Cross-Complainant Gerald
	Armstrong to Interrogatories Propounded by Plaintiff and Cross-
9	Defendant Church of Scientology of California (first set), and
10	know the contents thereof. The matters stated in the foregoing
11	document are true of my own knowledge except as to those matters
12	which are therein stated upon my information or belief, and as to
13	those matters I believe them to be true.
14	I declare under penalty of perjury under the laws of the
15	State of California, that the foregoing is true and correct.
16	Executed on April 3, 1986 at Boston, Massachusetts.
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19	Gerald Armstrong
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